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**BEFORE THE UNITED STATES
FEDERAL ELECTION COMMISSION**

Campaign Legal Center
215 E Street, NE
Washington, DC 20002
(202) 736-2200

Democracy 21
2000 Massachusetts Avenue, NW
Washington, DC 20036
(202) 355-9600

v.

MUR No.

6798

Senator David Vitter
David Vitter for US Senate
2900 Clearview Pkwy Suite 206
Metairie, La 70006

The Fund for Louisiana's Future ("FLF")
6048 Marshall Foch Street
New Orleans, LA 70124

Courtney Guastella

New Orleans, LA 70124

Lisa Spies
The LS Group, Inc.
912 F Street, NW #1106
Washington, DC 20004-1441

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COMMISSION
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COMPLAINT

1. This complaint is filed pursuant to 2 U.S.C. § 437g(a)(1) and is based on information and belief that U.S. Senator David Vitter, a candidate for reelection in 2016, The Fund for Louisiana's Future ("FLF") (ID: C00541037), an independent expenditure-only committee, and Courtney Guastella and Lisa Spies, acting as agents for Senator Vitter and FLF, solicited contributions for FLF in amounts that exceeded the federal

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contribution limits and from sources prohibited from giving in federal elections in violation of the Federal Election Campaign Act ("FECA"), 2 U.S.C. § 431, *et seq.*, and Federal Election Commission ("FEC" or "Commission") regulations.

2. FLF is a political action committee whose stated purpose is to support and promote David Vitter's candidacies for both U.S. Senate and governor of Louisiana. To support its activities, Senator Vitter and FLF, with Ms. Guastella and Ms. Spies acting as their agents, solicit contributions. These solicitations prominently feature Senator Vitter and are for amounts in excess of federal contribution limits and from sources prohibited by federal law, but do not contain disclaimers required by FECA and FEC regulations for solicitations made by federal candidates and officeholders. By undertaking such solicitations, Senator Vitter, FLF and Ms. Guastella and Ms. Spies acting as their agents, violated 2 U.S.C. § 441i(e) and 11 C.F.R. §§ 300.61 and 300.62.
3. "If the Commission, upon receiving a complaint . . . has reason to believe that a person has committed, or is about to commit, a violation of [the FECA] . . . [t]he Commission shall make an investigation of such alleged violation" 2 U.S.C. § 437g(a)(2); *see also* 11 C.F.R. § 111.4(a) (emphasis added).

Facts

4. Senator Vitter is currently a federal officeholder and a candidate for reelection to the U.S. Senate in 2016.¹ He has also announced that he is simultaneously running for Louisiana Governor in 2015.²

¹ David B. Vitter, FEC Form 2 Statement of Candidacy (filed on June 9, 2011 after Senator Vitter's most recent election in 2010).

5. FLF is registered with the FEC as an independent expenditure-only political committee³ (commonly referred to as a "Super PAC") and with the Louisiana Board of Ethics as a state Political Action Committee.⁴ It has been reported that FLF registered as both a federal and state political committee because it plans to use the contributions it receives to support Senator Vitter's election to *both* federal and state office. According to FLF's treasurer, the entity is "a 'vehicle for supporters for Sen. Vitter and his conservative leadership' to back his political future whether he decides to seek a third Senate term in 2016 or run for Louisiana governor."⁵

6. Courtney Guastella and Lisa Spies are employed as fundraising consultants for Senator Vitter and plainly have actual authority from Senator Vitter to solicit contributions that support his election. Senator Vitter has made them his exclusive fundraisers, repeatedly paying them from his federal committees and designating them as his contributors' contacts on fundraising invitations.⁶ These manifestations of actual authority continue still today.

² See, e.g., Burgess Everett & Emily Schultheis, *David Vitter to Run for Louisiana Governor in 2015*, POLITICO (Jan 21, 2014) (describing Senator Vitter's plan to run for governor in 2015 and to maintain his federal re-election candidacy for 2016).

³ Statement of Organization filed with FEC on January 23, 2013.

⁴ Statement of Organization filed with the Louisiana Board of Ethics on January 28, 2013. <http://www.ethics.state.la.us/CampaignFinanceSearch/13000776.pdf>.

⁵ Fredreka Schouten, *Super PACs Gear Up for Individual Senate Battles*, USA TODAY (Jan. 3, 2014). See also Alexander Burns, *David Vitter Stokes Buzz about Governor Bid*, POLITICO (May 22, 2013) (quoting FLF's treasurer in saying with regard to an FLF fundraising event that the Senator was "the special guest for a fundraising event and the funds from that event can be used to independently support him in his future endeavors").

⁶ For example of fundraising invitations listing Ms. Spies and Ms. Guastella as the contributor contacts, see Sunlight Foundation, Political Party Time, Sen. David Vitter Profile, <http://politicalpartytime.org/pol/N00009659/> (last visited Mar. 13, 2014).

7. Ms. Spies currently serves as the D.C. Finance Director for Senator David Vitter.⁷

According to reports filed with the FEC, Senator Vitter's authorized campaign committee paid Ms. Guastella \$212,776 and Ms. Spies \$142,481 in "fundraising consulting" fees from 2011 to 2013. In addition, his leadership PAC paid Ms. Guastella an additional \$47,796 in monthly fundraising retainer fees during that same period. No other fundraising consultant received any payment from either committee. Senator Vitter also lists one of the two individuals as the primary contact on all publicly available fundraising-event invitations.⁸ Senator Vitter therefore relies exclusively on Ms. Guastella and Ms. Spies to raise funds for his authorized campaign committee and leadership PAC.

8. According to FLF's reports filed with the FEC, Ms. Guastella and Ms. Spies are also the only fundraising consultants paid to solicit contributions for FLF. Ms. Guastella and Ms. Spies have been highly successful in raising funds for FLF, raising \$1,509,573.75 for FLF in 2013, with many five- and six-figure contributions coming from individuals and corporations.
9. Senator Vitter, through his fundraising agents, and FLF solicited contributions for FLF that exceed the federal contribution limits and from sources prohibited from giving in federal elections. For example:

⁷ See The LS Group, Inc., Biography of Lisa Spies, <http://www.thelsgroup.com/team> (last visited Mar. 10, 2014).

⁸ Sunlight Foundation, Political Party Time, Sen. David Vitter Profile, <http://politicalpartytime.org/pol/N00009659/> (last visited Mar. 13, 2014).

- i. Senator Vitter is the only candidate featured on the website for Fund for Louisiana's Future.⁹ His picture is part of the FLF logo banner, which appears on each page of the website taking up over one-third of the page. The home page prominently features a "Contribute" link next to a photograph of Senator Vitter, which takes you to a contribution page that seeks donations of \$25,000 or more.¹⁰

The disclaimer at the bottom of the page includes the following statement:

The Fund for Louisiana's Future is registered with the Federal Election Commission as an independent expenditure-only committee and the Louisiana Board of Ethics as a state PAC. The Fund for Louisiana's Future may accept contributions up to \$100,000 per election cycle from individuals, corporations, and other organizations.

The solicitation does not contain any disclaimers stating that Senator Vitter is soliciting only contributions that comply with federal limits and source prohibitions.

- ii. In September 2013, FLF held a "Louisiana Bayou Weekend" fundraising event, which featured an airboat swamp tour and an alligator hunt.¹¹ The invitation prominently listed Senator Vitter, who was the only person featured on the invitation, as the special guest for this event. Invitees were asked to "Reserve Your Spot Now!!" by making a \$5,000 contribution to FLF. But the disclaimer at the bottom of the page also included the statement that FLF was registered as both a federal and state PAC and that it may accept contributions up to \$100,000 per

⁹ See <http://www.louisianasfuture.com> (last visited Mar. 18, 2014). Screen shots of home and donation pages are attached hereto as Exhibit A.

¹⁰ See <http://www.louisianasfuture.com/donate> (last visited Mar. 18, 2014).

¹¹ Igor Bobic, *David Vitter Fundraises with Super PAC by Going Alligator Hunting (Photo)*, TALKING POINTS MEMO (Sept. 11, 2013) (relaying Senator Vitter's remark that he "[e]njoyed the gator hunt in the bayou this weekend," in reference to an FLF fundraising event).

election cycle from individuals, corporations, and other organizations.”¹² The solicitation did not contain any disclaimers stating that Senator Vitter was soliciting only contributions that comply with federal limits and source prohibitions. Courtney Guastella was listed as the contact person for contributors to the event.

Summary of Law

10. Federal law and FEC regulations make it illegal for a “[a] candidate, individual holding Federal office, agent of a candidate or an individual holding Federal office” to solicit, receive, direct, transfer, or spend funds in connection with federal or state elections, including funds to be used by a state party committee for any Federal election activity, unless the funds are subject to the limitations and prohibitions of FECA. 2 U.S.C. § 441i(e), and 11 C.F.R. §§ 300.61 and 300.62. This is known as the “soft money” prohibition and means that a federal candidate and his or her agents may solicit contributions to a political committee, such as FLF, from an individual or PAC only in amounts that do not exceed \$5,000 per year and may not solicit any funds from corporations or other federally prohibited sources.
11. Even where a federal candidate or office holder is simultaneously running as a candidate for state-level public office, that candidate, and his or her agents, may solicit funds in connection with a non-federal election “only in amounts and from sources . . . that do not exceed the Act’s contribution limits or come from prohibited sources under the Act.” 2

¹² FLF Fundraising Event Invitation, attached hereto as Exhibit B.

U.S.C. 441i(e)(1)(B), 11 C.F.R. § 300.63.¹³ The only exception for a federal candidate or officeholder simultaneously running in a state-level election is for solicitations “solely in connection with such election for state or local office if the solicitation, receipt, or spending of funds is permitted under state law and refers only to such state or local candidate” 2 U.S.C. § 441i(e)(2) (emphasis added).

12. Where a federal officeholder or candidate is mentioned in a solicitation for a fundraising event for another entity that is soliciting soft money contributions in excess of the federal limits and from prohibited sources, the FEC rules require that the solicitation must: (1) identify the federal candidate only “as a featured guest, honored guest, special guest, featured speaker, or honored speaker, or in any other manner not specifically related to fundraising” and (2) include “a clear and conspicuous disclaimer that the solicitation is not being made by the Federal candidate or officeholder.” 11 C.F.R. § 300.64(c)(3)(i)(A)-(B). Examples of the required “clear and conspicuous” disclaimer include:

- i. “Senator X is appearing at this event only as a featured speaker. He is not asking for funds or donations.”
- ii. “All funds solicited in connection with this event are by [name of committee raising non-federal funds] and not by Senator Y.”

See 11 C.F.R. § 300.64(c)(3)(iv). This disclaimer must be included in order for a federal candidate’s appearance on the publicity to comply with federal law and FEC regulations.¹⁴

¹³ 11 C.F.R. § 300.63 states that “[i]f an individual is simultaneously running for both Federal and State or local office, the individual must raise, accept, and spend only Federal funds for the Federal election.”

¹⁴ See FEC, *Participation by Federal Candidates and Officeholders at Non-Federal Fundraising Events*, Final Rules and Explanation and Justification, 75 Fed. Reg. 24375, 24381 (May 5, 2010) (stating that the additional requirement for a disclaimer is to “avoid any confusion” about the relationship between the solicitation and the federal candidate or officeholder).

13. Therefore, Senator Vitter and his agents can only solicit contributions for FLF in amounts up to \$5,000 from individuals and PACs and cannot solicit any funds from corporations or other federally prohibited sources unless the solicitation is limited solely to nonfederal election in which the candidate is running.¹⁵
14. An "agent" for purposes of the Commission's soft money solicitation rules is someone who has authority from a federal candidate to "solicit, receive, direct, transfer, or spend funds in connection with any election." 11 C.F.R. § 300.2(b)(3). This authority must be "actual authority," which is granted through explicit or implicit manifestations by the candidate to the prospective agent.¹⁶ A candidate may, for example, explicitly confer actual authority through definite actions or by granting a position.¹⁷ A candidate may also implicitly grant actual authority through acquiescence, "words[,] or conduct which the principal has reason to know indicate to the agent that he is to do [an] act for [his] benefit."¹⁸ Once granted, an agent's authority is typically broad. Unless otherwise agreed, for instance, "authority to conduct a transaction includes authority to do acts

¹⁵ See FEC Advisory Opinion (AO) 2011-12 (Majority PAC / House Majority PAC), 3-4 (concluding that federal officeholders, candidates, and their agents may not solicit more than \$5,000 in contributions to a "Super PAC" from individuals and PACs). See also FEC AO 2011-21 (Constitutional Conservatives Fund PAC) (stating that a PAC could not establish a "non-contribution" account to receive non-federal funds because of its affiliation with a federal officeholder).

¹⁶ This is in contrast to the theory of "apparent authority," which has been discarded by the Commission and is granted by the principal's manifestations to a third party. See FEC, *Prohibited and Excessive Contributions: Non-Federal Funds or Soft Money*, Final Rules and Explanation and Justification, 67 Fed. Reg. 49064, 49082 (July 29, 2002); FEC, *Definitions of "Agent" for BCRA Regulations on Non-Federal Funds or Soft Money and Coordinated and Independent Expenditures*, Final Rules and Explanation and Justification, 71 Fed. Reg. 4975, 4976 (Jan. 31, 2006) (hereafter "*Definitions of Agent*").

¹⁷ *Definitions of Agent*, 71 Fed. Reg. at 4978.

¹⁸ *Id.* at 4979.

which are incidental to it, usually accompany it, or are reasonably necessary to accomplish it.”¹⁹

15. Fundraising consultants and others who have actual authority from a federal candidate to solicit contributions are permitted to raise funds on behalf of another organization.²⁰

Accordingly, the Commission has made an effort to differentiate between: (1) legitimate dual-agency situations, where an individual can wear “multiple hats” and maintain actual and separate agent-principal relationships with a candidate and another organization; and (2) circumstances where soft money fundraising for another organization is simply an extension of the individual’s work for a candidate.²¹

16. The Commission applied this “multiple hat” approach in two Advisory Opinions (“AO”):

- i. In AO 2003-10, Rory Reid, son of U.S. Senator Harry Reid, asked the Commission whether he could raise non-federal funds for the Nevada State Democratic Party if Senator Reid also gave him actual authority to raise federal funds for the Senator’s campaign. AO 2003-10 at 2. Mr. Reid had an organizational role in the Party, as a former Party Chair and then-Commissioner of Clark County. He also planned to raise funds for the Party that could not, under federal law, benefit his father’s re-election effort. See 11 C.F.R. §§ 300.32

¹⁹ *Id.* at 4978.

²⁰ *Id.* at 4979 n.9 (“In order to preserve an individual’s ability to raise funds for multiple organizations, the Commission’s current regulations specifically require an agent to be acting on behalf of a candidate or party committee to be subject to BCRA’s soft money prohibition.”); FEC, *Coordinated and Independent Expenditures*, Final Rules and Explanation and Justification, 68 Fed. Reg. 421, 424 (Jan. 3, 2003) (remarking that a person would not be considered “an ‘agent’ of a candidate if that person approaches an outside spender on behalf of a different organization or person.”).

²¹ FEC AO 2003-10 (Reid), 5 (stating that the Commission rules “contemplate[] a dual-agency situation”); 67 Fed. Reg. at 49083 (remarking that an individual is an agent only if he “is acting on behalf of the principal and not . . . on behalf of other organizations or individuals”).

and 300.33. The Commission therefore found it credible that Mr. Reid's fundraising would be "exclusively on behalf of the Party" and permitted him to raise soft money. AO 2003-10 at 5.

- ii. In AO 2007-05, the Commission concluded that Congressman Denny Rehberg's Chief of Staff Erik Iverson could raise soft money for the Montana Republican State Party in a Party chair role, even if he would sometimes be Congressman Rehberg's fundraising "agent." AO 2007-05 at 2. This dual-agency arrangement was approved only if the non-federal fundraising would be conducted "exclusively on behalf of the State Committee, and not on the authority of any Federal candidate or officeholder." AO 2007-05 at 4. Given Mr. Iverson's Party role and the fact that no funds raised could assist Congressman Rehberg's election, *see* 11 C.F.R. §§ 300.32 and 300.33, the Commission found Mr. Erikson acted "exclusively" on the Party's behalf.

17. In both of these Advisory Opinions, the Commission relied, in part, on the representations that there would be a clear line between the activities on behalf of the candidate and those on behalf of the state party committees. Moreover, unlike the situation with Senator Vitter and FLF, these advisory opinions dealt with state party committees. Such committees are not only prohibited by FECA from using any soft money raised to support the federal candidates, but are also prohibited from using the soft money to engage in "federal election activity," which includes non-candidate specific state party activities. *See* 2 U.S.C. §§ 441i(a) and 431(20). These restrictions further reduce the ability of the soft money raised to influence the election of federal candidates.

Senator Vitter and FLF Unlawfully Solicited Soft Money Contributions

18. Given that FLF's solicitations are not solely in connection with an election for state or local office, every FLF solicitation or fundraising event that features Senator Vitter and seeks contributions that do not comply with the federal limits and prohibitions is required to include a "clear and conspicuous disclaimer that the solicitation [was] not being made by" Senator Vitter. As described above, FLF has undertaken such solicitations by seeking contributions up to \$100,000 per election cycle from individuals, corporations, and other organizations without including the required disclaimer. Further, the evidence clearly establishes reason to believe that Senator Vitter authorized the solicitations. This evidence includes:

- The nature, purpose and activities of FLF being focused solely on Senator Vitter's election.
- Senator Vitter's involvement in FLF fundraising activities.
- The fact that Ms. Guastella and Ms. Spies, Senator Vitter's only paid fundraising agents, are the only paid fundraising agents for FLF, both of whom are listed as contributor contacts for either Senator Vitter's campaign committee or leadership PAC and one of whom is listed as the contributor contact for an FLF event featuring Senator Vitter.

Therefore, there is reason to believe that Senator Vitter, as a federal officeholder and candidate, violated 2 U.S.C. § 441i(e) and 11 C.F.R. §§ 300.61 and 300.62 by soliciting contributions for FLF in excess of the federal contribution limits and from sources prohibited from contributing under federal law.²²

²² FLF's inclusion of a disclaimer stating that FLF's solicitation was "[n]ot authorized by any candidate or candidate's committee" cannot negate the evidence showing that Senator Vitter, through his agents, did authorize the solicitations at issue.

19. Further, there is reason to believe that FLF violated 2 U.S.C. § 441i(e) and 11 C.F.R. §§ 300.61 and 300.62 by acting as an agent of Senator Vitter when using his name to solicit soft money.

Courtney Guastella and Lisa Spies, Acting as Agents, Unlawfully Solicited Soft Money Contributions on Behalf of Senator Vitter

20. Under the FEC's rules defining when someone is considered an agent of a federal candidate or officeholder, Courtney Guastella and Lisa Spies had actual authority from Senator Vitter to solicit contributions to support his election and any fundraising they conduct as agents of Senator Vitter must comply with 2 U.S.C. § 441i(e) and the Commission regulations prohibiting soft money fundraising by federal officeholders and candidates.
21. The solicitations for FLF did not comply with federal law and FEC regulations. Therefore, there is reason to believe that Ms. Guastella and Ms. Spies violated the Act and Commission regulations when, as agents of Senator Vitter, they solicited contributions in a manner prohibited by 2 U.S.C. § 441i(e) and 11 C.F.R. §§ 300.61 and 300.62.
22. Based on the facts, Ms. Guastella and Ms. Spies cannot credibly argue that they had shed their "candidate hats" and were not in any way acting "on behalf of" Senator Vitter. As noted, FLF is expressly dedicated to electing Senator Vitter and Ms. Guastella and Ms. Spies have no organizational attachment to, or interest in, FLF that is independent from Senator Vitter. Most importantly, Ms. Guastella and Ms. Spies were raising soft money

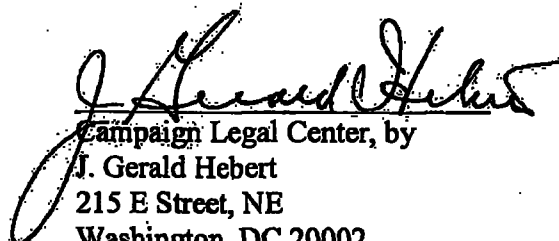
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23. for FLF for the express purpose of electing Senator Vitter, the candidate from whom they received actual authority to solicit contributions. This is fundamentally different from the Commission-approved activity of Messrs. Reid and Iverson, who solicited only those funds that could not legally be used to elect their federal-candidate principals, nor even be used by the recipient party committees for federal election activity. These facts demonstrate that Ms. Guastella and Ms. Spies do not have a legitimate and separate principal-agent relationship with FLF and that their FLF fundraising activities were simply an extension of their work for Senator Vitter. Ms. Guastella and Ms. Spies are therefore Senator Vitter's "agents" and have violated federal law by soliciting soft money contributions to benefit FLF.


Prayer For Relief

24. Wherefore, the Commission should find reason to believe that Senator Vitter, FLF, Ms. Guastella and Ms. Spies violated 2 U.S.C. § 431 *et seq.*, including 2 U.S.C. § 441i(e) and 11 C.F.R. §§ 300.61 and 300.62, and conduct an immediate investigation under 2 U.S.C. § 437g(a)(2). Further, the Commission should determine and impose appropriate sanctions for any and all violations, should enjoin the respondents from any and all violations in the future, and should impose such additional remedies as are necessary and appropriate to ensure compliance with the FECA.

March 18, 2014

Respectfully submitted,


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Counsel to Democracy 21

VERIFICATION


The complainants listed below hereby verify that the statements made in the attached Complaint are, upon their information and belief, true.

Sworn to pursuant to 18 U.S.C. § 1001.

For Complainant Campaign Legal Center


J. Gerald Hebert
J. Gerald Hebert

Sworn to and subscribed before me this 18th day of March, 2014.



Secretary Public

CHERYL L. OLSON
NOTARY-PUBLIC DISTRICT OF COLUMBIA
My Commission Expires October 31, 2014

For Complainant Democracy 21


Fred Wertheimer

Sworn to and subscribed before me this 10th day of March, 2014.


Secretary, Public Health

CHERYL L. OLSON
NOTARY PUBLIC DISTRICT OF COLUMBIA
My Commission Expires October 31, 2014

EXHIBIT

A

1604446M374

The FUND for LOUISIANA'S FUTURE

Contribute



Don't Exempt Obama

The president needs a taste of his own medicine and that's exactly what Senator Victor wants to do.

Senator Victor doesn't think the President and Congress should get special treatment if the American people don't like what they're doing. He's taking a bold stance and calling on the President to live under the rule of the law like the rest of America.

And President Obama isn't happy. He told Congress that he is committed to vetoing any bill that includes Senator Victor's provision.

Now we need to stand behind this committed conservative activist and challenge the President and Congress to live under the same laws as every other American.

You and I both know that the President and Congress need to use common sense when they just won't do it. Senator Victor's provision ensures that that happens.

If the President can't compromise and won't recognize the common sense of the American people, then he shouldn't be opposed to living under the same laws as the rest of the country. He needs to experience the problems first-hand.

Tell the President and Congress that they can't exempt themselves from their own law by signing our petition supporting Senator Victor's provision. If they want to change our health care for us, then they should have to live under the same rules we do.

Let's give them a taste of their own medicine. Please sign our petition today.

Sign the Petition

By signing this petition, you are supporting Senator Victor's provision to ensure that the President and Congress live under the same laws as every other American.

First Name:

Last Name:

Zip Code:

Email:

Paid for by The Fund for Louisiana's Future. Not authorized by any candidate or candidate's committee.
5045 Marshall Foch Street, New Orleans, LA 70124, (504) 772-0905, LouisianaFuture.com

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the FUND for LOUISIANA'S FUTURE



Amount

- SELECT AMOUNT:**
- ☐ \$25.00
 - ☐ \$50.00
 - ☐ \$100.00
 - ☐ \$250.00
 - ☒ \$500.00
 - ☐ \$1,000.00
 - ☐ \$2,500.00
 - ☐ \$5,000.00
 - ☐ \$10,000.00
 - ☐ \$25,000.00
 - ☐ Other

OTHER AMOUNT:

DONATION TYPE:

Payment Information

WE ACCEPT THE FOLLOWING:    

CREDIT CARD #:

EXPIRES ON:

[What's this?](#)

NAME ON CARD:

EMAIL:

PHONE #:

Transact account holders [click here to login](#).

If you do not have a Transact account please continue filling out the donation form.



Personal Information

FIRST NAME*

OCCUPATION*

LAST NAME*

EMPLOYER*

ADDRESS*

CITY*

STATE*

ZIP*

Billing Address

☐ Same as Personal Address

ADDRESS*

CITY*

STATE*

ZIP*

Confirm and Submit

I am a United States citizen or an individual admitted with permanent residence status (e.g. a "green card holder") and the funds for this contribution are from domestic (American) sources. In addition, this contribution, whether personal or corporate, will not be reimbursed by another person or entity.

I understand that:

Contributions to The Fund for Louisiana's Future are not deductible as charitable contributions for federal income tax purposes. Contributions from foreign nationals are prohibited. Federal government contractors should consult counsel prior to making a contribution to The Fund for Louisiana's Future. The Fund for Louisiana's Future is registered with the Federal Election Commission as an independent expenditure-only committee and the Louisiana Board of Ethics as a state PAC. The Fund for Louisiana's Future may accept contributions up to \$100,000 per election cycle from individuals, corporations, and other organizations. The Fund for Louisiana's Future's spending is independent, and it does not make contributions to, or coordinate its spending with, any candidates or political parties.

☐ I AGREE TO THE TERMS ABOVE

Submit

If you need help with your submission, please contact support@transact.com

After you click on the Submit button, you will have the opportunity to sign up for a transact account to simplify your future donation experience.

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6048 Marshall Foch Street, New Orleans, LA 70124, (504) 772-0909, LouisianaFuture.com.

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EXHIBIT

Save the Date & Reserve Your Place Now!!
The Fund for Louisiana's Future
Invites You To A

Louisiana Bayou Weekend

Come Enjoy
Cajun Cooking
Airboat Swamp Tour
And

ALLIGATOR HUNT

With Special Guest

U.S. Senator David Vitter



Thursday, Sept 5th -Saturday, Sept 7th 2013
\$5,000 Per Person

***** Accommodations will be made for all guests*****

***Save your place for this exciting adventure in
swamps and bayous of south Louisiana!***

Space very limited!!

**To reserve your spot, please contact Courtney Guastella at
504-615-2083 or courtneyguas@gmail.com**

Contributions to The Fund for Louisiana's Future are not deductible as charitable contributions for federal income tax purposes. Contributions from foreign nationals are prohibited. Federal government contractors should consult counsel prior to making a Contribution to The Fund for Louisiana's Future. The Fund for Louisiana's Future is registered with the Federal Election Commission as an independent expenditure-only committee and the Louisiana Board of Ethics as a state PAC. The Fund for Louisiana's Future may accept contributions up to \$100,000 per election cycle from individuals, corporations, and other organizations. The Fund for Louisiana's Future's spending is independent, and it does not make contributions to, or coordinate its spending with, any candidates or political parties.

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6048 Marshall Fuch Street, New Orleans, LA 70124.
(202) 772-0909. LouisianasFuture.com.

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